

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
VICTORIA DIVISION**

In re:

INFOW, LLC, *et al.*,

Debtors.¹

Case No. 22-60020

Chapter 11

(Jointly Administered)

**AGENDA OF MATTERS THAT MAY BE DISCUSSED AT
THE APRIL 29, 2022 STATUS CONFERENCE**

The above-referenced debtors and debtors in possession (collectively, the “Debtors”) file this Agenda of Matters That May Be Discussed at the Status Conference on **April 29, 2022, at 3:00 P.M. (prevailing Central Time)** (the “Status Conference”) before the Honorable Christopher M. Lopez, United States Bankruptcy Judge, 515 Rusk, 4th Floor, Courtroom 401, Houston, Texas 77002.

I. CURRENT STATUS OF PENDING MOTIONS

- a. Debtors’ Emergency Motion for Order Authorizing Appointment of Russell F. Nelms and Richard S. Schmidt as Trustees of the 2022 Litigation Settlement Trust and Granting Related Relief [ECF No. 6] – filed April 18, 2022
 - i. Objection of the United States Trustee to Debtors’ Emergency Motion for Order Authorizing Appointment of Russell F. Nelms and Richard S. Schmidt as Trustees of the 2022 Litigation Settlement Trust and Granting Related Relief [ECF No. 18]
 - ii. **STATUS: Hearing Date Needed**
- b. Debtors’ Emergency Application for Interim and Final Orders (A) Authorizing Employment of W. Marc Schwartz as Chief Restructuring Officer, (B) Authorizing Employment of Staff of Schwartz Associates, LLC in Discharge of Duties as Chief Restructuring Officer, and (C) Granting Related Relief [ECF No. 7] – filed April 18, 2022
 - i. **STATUS: Hearing Date Needed**

¹ The Debtors in these chapter 11 cases along with the last four digits of each Debtor’s federal tax identification number are as follows: InfoW, LLC, f/k/a Infowars, LLC (6916), IWHealth, LLC f/k/a Infowars Health, LLC (no EIN), Prison Planet TV, LLC (0005). The address for service to the Debtors is PO Box 1819, Houston, TX 77251-1819.

- c. Debtors' Motion for Entry of an Order (I) Setting Bar Dates for Filing Proofs of Claims, (II) Establishing Amended Schedules Bar Date and Rejection Damages Bar Date, (III) Approving the Form of and Manner for Filing Proofs of Claims, (IV) Approving Notice of Bar Dates, and (V) Granting Related Relief [ECF No. 35]
- i. **STATUS: Hearing Date Needed**
- d. Connecticut Plaintiffs' Emergency Motion to Dismiss Chapter 11 Cases and Objection to Debtors' Designation as Subchapter V Small Vendors [ECF No. 36] – filed April 26, 2022
 - i. Debtor's Preliminary Objection to Connecticut Plaintiff's Emergency Motion to Dismiss Chapter 11 Cases and Objection to Debtors' Designation as Subchapter V Small Vendors [ECF No. 40] – filed April 27, 2022
 - ii. **STATUS: Hearing Date Needed**
- e. The Texas Litigation Plaintiffs' Supplemental Motion to Dismiss Petition [ECF No. 42] – filed April 27, 2022
 - i. **STATUS: Hearing Date Needed**

II. REMOVAL, REMAND, TRANSFER VENUE AND WITHDRAWAL OF REFERENCE

- a. Texas Plaintiffs
 - i. Removed Suit: Neil Heslin and Scarlett Lewis v. Alex Jones, Infowars, LLC, Free Speech Systems, LLC and Owen Shroyer, Adv. Proc. No. 22-01023-hcm pending in the United States Bankruptcy Court for the Western District of Texas, Austin Division – Commenced on April 18, 2022
 - 1. Plaintiffs' Motion for Abstention and Remand [ECF No. 7] filed April 26, 2022
 - a. InfoW, LLC's Response to Plaintiffs' Motion for Abstention and Remand [ECF No. 9] – filed April 28, 2022
 - 2. Defendant InfoW, LLC's Motion to Transfer Venue [ECF No. 10] – filed April 28, 2022
 - ii. Removed Suit: Leonard Pozner and Veronique De La Rosa v. Alex Jones, Infowars, LLC, and Free Speech Systems, LLC, Adv. Proc. No. 22-01021-hcm pending in the United States Bankruptcy Court for the Western District of Texas, Austin Division – Commenced on April 18, 2022
 - 1. Defendant InfoW, LLC's Motion to Transfer Venue [ECF No. 2] – filed April 28, 2022
 - iii. Removed Suit: Michael Fontaine v. Alex Jones, Infowars, LLC, Free Speech Systems, LLC and Kit Daniels, Adv. Proc. No. 22-01022-hcm

pending in the United States Bankruptcy Court for the Western District of Texas, Austin Division – Commenced on April 18, 2022

1. Defendant InfoW, LLC’s Motion to Transfer Venue [ECF No. 7] – filed April 28, 2022

b. Connecticut Plaintiffs

- i. Removed Suit: Erica Lafferty, David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Jeremy Richman, Donna Soto, Carlee Soto-Parisi, Carlos M. Soto, Jillian Soto, and William Aldenberg v. Alex Emric Jones, InfoWars, LLC; Free Speech Systems, LLC; InfoWars Health, LLC; Prison Planet TV, LLC; Wolfgang Halbig, Corey T. Sklanka, Genesis Communications Network, Inc., and Midas Resources, Inc., Adv. Pro. No. 22-05004 pending in the United States Bankruptcy Court for the District of Connecticut, Bridgeport Division – Commenced on April 18, 2022

1. Motion for Remand [ECF No. 5] – filed April 21, 2022

- ii. Removed Suit: William Sherlach v. Alex Emric Jones, InfoW, LLC; IW Health, LLC; Prison Planet TV, LLC; and Genesis Communications Network, Inc., Adv. Pro. No. 22-05005 pending in the United States Bankruptcy Court for the District of Connecticut, Bridgeport Division – Commenced on April 18, 2022

1. Motion for Remand [ECF No. 5] – filed April 21, 2022

- iii. Removed Suit: William Sherlach and Robert Parker v. Alex Emric Jones, InfoWars, LLC; Free Speech Systems, LLC; InfoWars Health, LLC; Prison Planet TV, LLC; Wolfgang Halbig, Corey T. Sklanka, Genesis Communications Network, Inc., and Midas Resources, Inc., Adv. Pro. No. 22-05006 pending in the United States Bankruptcy Court for the District of Connecticut, Bridgeport Division – Commenced on April 18, 2022

1. Motion for Remand [ECF No. 5] – filed April 21, 2022

III. RECENT KEY AGREEMENTS FILED

- a. Amended and Restated Declaration of Trust [ECF No. 48-1]
- b. Amended and Restated Plan Support Agreement [ECF No. 48-3]

IV. MOTIONS TO BE FILED NEXT WEEK BY DEBTORS

- a. Motion for (A) Order Authorizing the Estimation of Litigation Claims, for Distribution Purposes, Establishing Claim Estimation Procedures, and Granting Related Relief, and (B) Order Estimating Litigation Claims Pursuant to 11 U.S.C. Section 502(c)
- b. Debtors’ Motion for Entry of an Order Compelling Mediation of Plan and Confirmation Related Disputes

- i. Request mediation in month of June 2022
- ii. Request confirmation hearing in late July and early August 2022

Dated: April 29, 2022.

Respectfully submitted,

/s/Kyung S. Lee

PARKINS LEE & RUBIO LLP

Kyung S. Lee PLLC

TX Bar No. 12128400

R.J. Shannon

TX Bar No. 24108062

Pennzoil Place

700 Milam Street, Suite 1300

Houston, Texas 77002

Email: klee@parkinslee.com

rshannon@parkinslee.com

Phone: 713-715-1660

Proposed Counsel to the Debtors

CERTIFICATE OF SERVICE

I hereby certify, a true and correct copy of the foregoing document was served (a) by the Court's CM/ECF system on all parties registered to receive such service and (b) on the following parties by email:

Kaster Lynch Farrar & Ball, LLP
Attn: Mark Bankson, William Ogden
1117 Herkimer Street
Houston, TX 77008
mark@fbtrial.com
bill@fbtrial.com

Koskoff & Bieder
Attn: Alinor C. Sterlin, Christopher Mattei,
Matthew Blumenthal
350 Fairfield Avenue
Bridgeport, CT 06604
asterling@koskoff.com
cmattei@koskoff.com
mblumenthal@koskoff.com

Fertitta & Reynal LLP
Attn: F. Andino Reynal
917 Franklin St., Suite 600
Houston, TX 77002
areynal@frlaw.us

Pattis & Smith, LLC
Attn: Cameron L. Atkinson
383 Orange Street
New Haven, CT 06511
npattis@pattisandsmith.com
catkinson@pattisandsmith.com

Zeisler & Zeisler P.C.
Attn: Eric Henzy
10 Middle Street, 15th Floor
Bridgeport, CT 06604
ehenzy@zeislaw.com

Jordan & Ortiz, P.C.
Attn: Shelby Jordan
500 N. Shoreline Blvd. Suite 900
Corpus Christi, Texas 78401
sjordan@jhwclaw.com

Law Office of Ray Battaglia, PLLC
Attn: Ray Battaglia
66 Granburg Circle
San Antonio, TX
rbattagliaw@outlook.com

McDowell Heterhington LLP
Attn: Avi Moshenberg, Nick Lawson,
Matthew Caldwell
1001 Fannin Street, Suite 2700
Houston, TX 77002
avi.moshenberg@mhlhp.com
nick.lawson@mhlhp.com
matthew.caldwell@mhlhp.com

The Akers Law Firm PLLC
Attn: Cordt Akers
3401 Allen Parkway, Suite 101
Houston, TX 77019
cca@akersfirm.com

Copycat Legal PLLC
Attn: Daniel DeSouza
3111 N. University Drive, Suite 301
Coral Springs, FL 33065
dan@copycatlegal.com

Richard S. Schmidt
615 Leopard, #635
Corpus Christi, TX 78401
rss@judgerss.com

Russell F. Nelms
115 Kay Lane
Westworth Village, TX 76114
rfargar@yahoo.com

Attn: W. Marc Schwartz
Schwartz Associates
712 Main Street, Ste. 1830
Houston, TX 77002
MSchwartz@schwartzassociates.us

Matthew Okin
Okin Adams LLP
1113 Vine St., Ste. 240
Houston, TX 77002
mokin@okinadams.com

Office of the United States Trustee
Attn: Ha Minh Nguyen, Jayson Ruff
515 Rusk St
Ste 3516
Houston, TX 77002
ha.nguyen@usdoj.gov
jayson.b.ruff@usdoj.gov

Melissa Haselden
700 Milam, Suite 1300
Houston, TX 77002
mhaselden@haseldenfarrow.com

Cain & Skarnulis, PLLC
Attn: Ryan E. Chapple
303 Colorado St., Ste. 2850
Austin, TX 78701
rchapple@cstrial.com

Byman & Associates PLLC
Randy W. Williams
7924 Broadway, Suite 104
Pearland, TX 77581
rww@bymanlaw.com

J. Maxwell Beatty
The Beatty Law Firm PC
1127 Eldridge Pkwy, Ste. 300, #383
Houston, TX 77077
max@beattypc.com

Walston Bowlin Callendar, PLLC
Attn: Cliff Walston
San Felipe Street, Suite 300
Houston, TX 77027
cliff@wbctrial.com

/s/ R. J. Shannon
R. J. Shannon